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October 25, 2019

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

RE: Frontier Communications of the Carolinas, LLC

Docket No. 2009-220-C

Dear Ms. Boyd:

By this letter, the Office of Regulatory Staff ("ORS") hereby notifies the Public Service Commission of South Carolina ("Commission") that Frontier Communications of the Carolinas, LLC ("Frontier" or "Company") is experiencing an extended service outage in the St. Luke's community of Georgetown County. ORS was only made aware of this outage when contacted by Senator Sabb earlier this week. ORS received no customer complaints regarding this outage and Frontier did not report the outage to ORS.

After being made aware of the service failure, which has now lasted for over three weeks, ORS contacted Frontier representative, Ms. Susan Miller. Ms. Miller informed ORS that the operating system for the remote terminal serving this neighborhood stopped functioning. Frontier attempted to restart the equipment or reload the software but has not been successful. Ms. Miller indicates that Frontier is engineering a new cable route to serve these customers via another remote terminal. However, Ms. Miller informed ORS it will take the Company at least another week for the Company to run a four mile stretch of temporary line to reconnect service to its St. Luke's customers. Such an extended period to re-establish service via a temporary line is unacceptable because Frontier's lines may be the only telephone connection for many of the citizens of the St. Luke's community to contact emergency services.

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It is the position of ORS that Frontier's continued delay in providing service violates S.C. Code Ann. Reg. 103-661(A) which, in part, requires Frontier to reestablish service "within the shortest time practicable." Frontier's actions appear to additionally violate S.C. Code Ann. Regs. 103-630 and 103-654 as the Company has clearly failed to maintain its system in a sufficient state of repair so as to provide "adequate service" to its customers in the St. Luke's community of Georgetown County. Frontier receives funding from the SC Universal Service Fund ("USF") to provide telecommunications service at affordable rates to residential and business customers. As a recipient of USF, Frontier must meet service quality standards set by the Commission and invest and maintain its South Carolina network to deliver basic telephone service to its customers. In 2018, Frontier asserted that "the decline in funding available to support provision of basic local telephone service makes the predictable funding from the South Carolina Universal Service Fund even more critical than in the past." The extended outage in Georgetown County demonstrates that Frontier is not honoring the Company's commitment to invest in and maintain its network to provide basic local telephone service in exchange for receiving SC USF.

ORS therefore requests that the Commission direct and order Frontier to restore service to its customers in the St. Luke's area of Georgetown County immediately, consistent with any safety issues or concerns. Frontier's customers should not be required to tolerate any further unexcused delay in the restoration of service.

Yours Truly,

Jeffrey M. Nelson

cc: Senator Ronnie A. Sabb (via U.S. Mail)

Representative Carl L. Anderson (via U.S. Mail)

Ms. Susan Miller (via U.S. Mail and E-mail)

¹ https://ors.sc.gov/sites/default/files/Documents/Consumers/Telecommunications/5-23-18%20USF%20PURC%20report.pdf